

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

PAUL O'MARA and NEAL O'MARA,

Plaintiffs/
Defendants-in-Counterclaim,

 \mathbf{y}_2

MARK J. DONNELLY,
SEBAGO PARTNERS, INC, and
UCOMPAREHEALTHCARE, LLC

Defendants/
Plaintiffs-in-Counterclaim.

C.A. No: 05-11824-REK

JOINT MOTION TO ENTER PRELIMINARY DISCOVERY ORDER

The parties, by their undersigned counsel, hereby jointly move to have the Court enter a Preliminary Discovery Order in the form that is attached hereto so as to establish a schedule for certain expedited discovery in connection with the hearing scheduled for March 29, 2006 upon Defendants' Motion for Preliminary Injunction.

Dated: February 28, 2006.

PAUL O'MARA AND NEAL O'MARA

By their attorneys,

/s/ Dale C. Kerester

Dale C. Kerester, Esq.

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MARK J. DONNELLY, SEBAGO
PARTNERS, INC., AND
UCOMPAREHEALTHCARE, LLC

By their attorneys,

/s/ Tyler E. Chapman

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CERTIFICATE OF SERVICE

I, Tyler E. Chapman, hereby certify that this document has been filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this date.

Date: February 27, 2006

/s/ Tyler E. Chapman

Tyler E. Chapman

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

PAUL O'MARA and NEAL O'MARA,)	
)	
Plaintiffs/)	
Defendants-in-Counterclaim,)	
)	C.A. No: 05-11824-REK
v.)	
)	
MARK J. DONNELLY,)	
SEBAGO PARTNERS, INC, and)	
UCOMPAREHEALTHCARE, LLC)	
)	
Defendants/)	
Plaintiffs-in-Counterclaim.)	

PRELIMINARY DISCOVERY ORDER

This matter having come before the Court by joint motion of Plaintiffs/Defendants-in-Counterclaim Paul O'Mara and Neal O'Mara and Defendants/Plaintiffs-in-Counterclaim Mark J. Donnelly, Sebago Partners, Inc. and UCompareHealthCare, LLC (collectively, the "Parties") to establish a schedule for certain expedited discovery in connection with the hearing scheduled for March 29, 2006 upon Defendants' Motion for Preliminary Injunction.

IT IS HEREBY ORDERED, as follows:

The Parties shall serve First Requests for Production of Documents by March 1, 2006.

The Parties shall serve Rule 16 Disclosures and Documents by March 6, 2006.

The Parties shall serve Responses to the First Requests for Production of Documents, including responsive documents (subject to any objections), by March 10, 2006.

Each side shall have no more than four (4) deposition days (each deposition to be limited to one day) that commence at 10 a.m. and conclude at 4 p.m., and all such depositions must be completed by March 22, 2006.

This Order shall be without prejudice to the Parties' rights to conduct additional discovery in this case after the hearing upon Defendants' Motion for Preliminary Injunction.

SO ORDERED.

Honorable Robert E. Keeton
United States District Court Judge

Dated: _____